

JAP:MSM

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**15 M 357**

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UNITED STATES OF AMERICA

- against -

PRE-ARRAIGNMENT  
COMPLAINT

GYAN MORGAN,

(21 U.S.C. §§ 952(a) and 960)

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

JOSH SCHOTTENFELD, being duly sworn, deposes and states that he is a  
Special Agent with the Department of Homeland Security, Homeland Security  
Investigations, duly appointed according to law and acting as such.

On or about April 19, 2015, within the Eastern District of New York and  
elsewhere, the defendant GYAN MORGAN did knowingly, intentionally and unlawfully  
import into the United States from a place outside thereof, cocaine, a Schedule II controlled  
substance.

(Title 21, United States Code, Sections 952(a) and 960)

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. On April 19, 2015, the defendant GYAN MORGAN arrived at John F. Kennedy International Airport ("JFK") in Queens, New York aboard Jamaica Airways flight number 121 from Kingston, Jamaica.
2. A Customs and Border Protection ("CBP") Officer stopped the defendant GYAN MORGAN for a border enforcement examination. A baggage examination was completed, which yielded negative results. In response to questioning, the defendant appeared nervous and provided an inconsistent story to the CBP officer. A pat-down search was requested and approved, which also yielded negative results. Upon further questioning, the defendant was suspected of being an internal courier for controlled substances.
3. The defendant initially refused to sign an x-ray consent form and was transported to the medical facility at JFK for a monitored bowel movement. At the medical facility, the defendant stated, in sum and substance, that he had swallowed approximately seventy (70) pellets. He thereafter signed the x-ray consent form.
4. An x-ray was taken of the defendant's intestinal tract, which was positive for foreign bodies. Thereafter, the defendant passed 8 pellets, one of which field-tested positive for the presence of cocaine. The defendant was then placed under arrest.
5. The defendant was advised of his Miranda warnings by an HSI special agent, which he stated he understood and agreed to waive. The defendant stated, in sum and

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.


substance and in part, that he knew that the pellets he had swallowed contained cocaine and that he was supposed to be paid \$4,500 for transporting the drugs to the United States.

6. The defendant GYAN MORGAN will be detained at the JFK medical facility until such time as he has passed all the pellets contained within his intestinal tract.

WHEREFORE, your deponent respectfully request that the defendant GYAN MORGAN be dealt with according to law.

  
\_\_\_\_\_  
JOSH SCHOTTENFELD  
Special Agent  
Homeland Security Investigations

Sworn to me before this  
20th day of April, 2015

  
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THE HONORABLE VERA M. SCANLON  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK